

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**ePLUS INC.,** )  
Plaintiff, ) Civil Action No. 3:09-CV-620 (REP)  
v. )  
**LAWSON SOFTWARE, INC.,** )  
Defendant. )

**ePLUS, INC.'S OBJECTIONS TO DEFENDANT LAWSON SOFTWARE, INC.'S  
PROPOSED EXHIBIT LIST FOR CONTEMPT PROCEEDINGS**

Pursuant to Section 15(c) of the Court’s Scheduling Order as amended, Plaintiff *ePlus*, Inc. (“*ePlus*”), through counsel, hereby submits the following general and specific objections to Defendant *Lawson Software, Inc.* (“*Lawson*”)’s proposed exhibit list for contempt proceedings:

## General Objections

1. Documents not previously disclosed during discovery or pursuant to Court Order.

*ePlus* objects generally to the introduction of any evidence which, though it may be relevant to Lawson's defenses, was not previously disclosed during discovery or in its responses to *ePlus*'s interrogatories.

2. Relevance. *ePlus objects generally to Lawson's introduction of any evidence having no tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable and to the introduction of evidence wherein the probative value of that evidence is substantially outweighed by the danger of unfair prejudice,*

confusion of the issues, or misleading the jury, or by considerations of undue delay, waste of time, or needless presentation of cumulative evidence.

3. Attorney comment or argument. *e*Plus objects generally to Lawson's attempt to introduce, as substantive evidence, litigation documents including discovery responses, deposition transcripts, briefs filed with the Court and correspondence amongst the attorneys. These documents are not evidence and should not be presented as such in the contempt hearing.

### KEY FOR EXHIBIT OBJECTIONS

Reference	Basis for Objection
106	Fairness requires admission of other evidence contemporaneously.
401/402	The evidence in the exhibit is not relevant and is not admissible.
403	Any relevance of the exhibit is substantially outweighed by the danger of unfair prejudice, confusion of the issues, misleading the jury, or considerations of unfair delay, waste or confusion of the issues, misleading the jury, or considerations of unfair delay, waste of time, or needless presentation of cumulative evidence.
801/802/805	The exhibit contains or is hearsay and no exception applies and/or the exhibit contains or is hearsay within hearsay and no exception applies.
901	The exhibit lacks authentication.
1003	Poor duplicate – unfair to admit as duplicate (Best Evidence)
1006	The evidence in the exhibit includes improper summary of evidence.
FRCP 26	Not timely disclosed.
MIL	Subject of motion <i>in limine</i> .
NR	Exhibit not received—all objections are reserved.
INACC	Inaccurate or incomplete description of exhibit.
NOT EVIDENCE	Exhibit is not evidence under the Federal Rules of Evidence.

## Specific Objections

Def. No.	Pkt. No.	Begin Bates	End Bates	Date	Exhibit Description	106	401/402	403	801/802/8	901	1006	FRCP 26	MIL	NR	INACC	NOT EVIDENCE
DX-500				1/27/2011	Signed verdict form	X								X		
DX-501				1/4/2011	Transcript of merits trial (Opening Statement) (pages 112-196) (pages 216-399)	X	X	X					X			
DX-502				1/4/2011	Transcript of merits trial (Testimony of Jim Johnson) (pages 448-480)	X	X	X					X			
DX-503				1/5/2011	Transcript of merits trial (Testimony of Alfred Weaver) (pages 482-510)	X	X	X					X			
DX-504				1/5/2011	Transcript of merits trial (Testimony of Alfred Weaver) (pages 517-922)	X	X	X					X			
DX-505				1/6/2011	WITHDRAWN											
DX-506					WITHDRAWN											
DX-507					WITHDRAWN											
DX-508					WITHDRAWN											
DX-509					WITHDRAWN											
DX-510					WITHDRAWN											
DX-511				1/13/2011	Transcript of merits trial (Testimony of Michael Shamos) (pages 173-178)	X	X	X					X			
DX-512				1/14/2011	Transcript of merits trial (Testimony of Michael Shamos) (pages 1792-1948)	X	X	X					X			
DX-513				1/20/2011	Transcript of merits trial (Testimony of Brooks Hilliard) (pages 2656-2792)	X	X	X					X			
DX-514				1/24/2011	Transcript of merits trial (Closing Arguments) (pages 3086-3230)	X	X	X					X			
DX-515					WITHDRAWN											
DX-516					WITHDRAWN											
DX-517					WITHDRAWN											
DX-518					WITHDRAWN											
DX-519					WITHDRAWN											
DX-520					Goldberg Report Ex. 3 – Video – Weaver Merits Trial Two											
DX-521	PX-368			1/20/2012	Punchout demonstration											
DX-522	PX-380			1/20/2012	Goldberg Report Ex. 4 – Video – Weaver Merits Trial Item Master / Punchout demonstration											
DX-523				1/20/2012	Goldberg Report Ex. A – Goldberg CV	X										
DX-524					WITHDRAWN											
DX-525	PX-1166	RQC0000744	RQC0000744		Source code	X	X	X					X		X	
DX-526	PX-1167	RQC0000745	RQC0000745		Source code	X	X	X					X		X	
DX-527	PX-1172	RQC0000746	RQC0000746		Source code differences file	X	X	X					X		X	
DX-528	PX-1168	RQC0000747	RQC0000747		Source code	X	X	X					X		X	
DX-529	PX-1169	RQC0000748	RQC0000748		"Lawson 4GL Diff Document"	X	X	X					X		X	
DX-530	PX-1173	RQC0000749	RQC0000749		Source code differences file	X	X	X					X		X	
DX-531	PX-1170	RQC0000750	RQC0000750		Source code differences file	X	X	X					X		X	
DX-532	PX-1171	RQC0000751	RQC0000751		Source code differences files	X	X	X					X		X	
DX-533	PX-1159	RQC0000730	RQC0000730		"Important Notice: Recommended Patch Available for Procurement Punchout Customers"											
DX-534	PX-1160	RQC0000731	RQC0000731		Patch for Requisition Center 9.0.1 Now Available"											
DX-535				5/6/2011	Letter from Daniel McDonald to Scott Robertson re. ePlus, Inc. v. Lawson Software, Inc.	X	X	X								
DX-536				5/18/2011	Letter from Daniel McDonald to Scott Robertson re. ePlus, Inc. v. Lawson Software, Inc.	X	X	X								
DX-537				6/16/2011	Letter from Scott Robertson to Daniel McDonald re. ePlus, Inc. v. Lawson Software, Inc.	X	X	X								
DX-538				6/24/2011	Letter from Scott Robertson to Daniel McDonald re. ePlus, Inc. v. Lawson Software, Inc.	X	X	X								
DX-539				6/28/2011	Letter from Daniel McDonald to Scott Robertson re. ePlus, Inc. v. Lawson Software, Inc.	X	X	X								
DX-540				7/1/2011	Letter from Scott Robertson to Daniel McDonald re. ePlus, Inc. v. Lawson Software, Inc.											

Stipulated Exhibit

## Specific Objections

Def. No.	Pkt. No.	Began Bates	End Bates	Date	Exhibit/Description	106	401/402	403	801/802/8	901	1006	FRCP 26	MIL	NR	INACC	NOT EVIDENCE
DX-541				7/6/2011	Letter from Daniel McDonald to Scott Robertson re: ePlus Inc. v. Lawson Software, Inc.											
DX-542	PX-1				U.S. Patent No. 6,023,683	WITHDRAWN										
DX-543	PX-1				1/4/2011	WITHDRAWN Weaver Trial Demonstratives	X	X	X	X	X	X	X	X	X	
DX-544					3/30/2011	Lawson Opposition to Motion for Permanent injunction	X	X	X	X	X	X	X	X	X	
DX-545					4/1/2011	ePlus Reply to Motion for Permanent injunction	X	X	X	X	X	X	X	X	X	
DX-546					4/4/2011	Transcript of April 4, 2011 injunction hearing	X	X	X	X	X	X	X	X	X	
DX-547					2012.01.06	Deposition of Dean Hager – Exhibit 4 – Email from Mike Cohen to Bruce McPheeers FWD: CUE Demo Plans, need help										
DX-548					2012.01.06	Deposition of Dean Hager – Exhibit 6 & 2012.01.06 Deposition of Keith Lohkamp – Exhibit 9 – Email from K. Lohkamp to D. Hager RE: Questions										
DX-549	PX-1088	RQC22282399	RQC2282402	3/7/2011												
DX-550	PX-1090	RQC0026599	RQC0026602	3/25/2011												
DX-551		RQC0054042	RQC0054042	5/10/2011	Email from Jim Catalino to Dean Hager RE: Anything on ePlus? I have staff meeting and wanted to provide update. Itx 2012.01.06 Deposition of Dean Hager – Exhibit 18 – Email from Jennifer Langer to Guy Leduc et al. FW: Supporting Materials for Mtg 2.00 – RE: project team for ePlus (and attachment)											
DX-552	PX-1111	RQC2091954	RQC2091959	5/26/2011	Email from Brad Nauman to Jeff Hvass et al. FW: ePlus											
DX-553		RQC2125337	RQC2125337	4/13/2011	Email from Dean Hager to Darci Snyder Re: Clarity on mobile											
DX-554		RQC0922446	RQC0922446	4/25/2011	Email from Jennifer Langer to Michael Poling et al. URGENT: Your Action Required for Q4 Opportunities and Beyond (S3 Requisitions, Self Service)											
DX-555		RQC0870441	RQC0870443	5/9/2011	2011.12.21 Deposition of Elizabeth Homewood – Exhibit 08 – "Decommision Notice – S3 Requisitions, Self-Service"											
DX-556	PX-1096	RQC0914942	RQC0914945	6/9/2011	2012.01.06 Deposition of Keith Lohkamp – Exhibit 8 – Email from D. Christipherson to D. Hager, B. McPheeers et al. RE: RQC Patch 1 updated											
DX-557	PX-1037	RQC0000636	RQC0000637	6/3/2011	2011.12.21 Deposition of Elizabeth Homewood – Exhibit 08 – "Immediate replacement of Requisitions Self Service software products required."											
DX-558	PX-1104	RQC000732	RQC000738	5/27/2011	2012.01.06 Deposition of Elizabeth Homewood – Exhibit 08 – "Immediate replacement of Requisitions Self Service software products required"											
DX-559		RQC0762337	RQC0762343	6/1/2011	2011.12.21 Deposition of Elizabeth Homewood – Exhibit 08 – "Immediate Support Stop for M3 e-Procurement solution required."											
DX-560		RQC000724	RQC000725	5/27/2011	2011.12.21 Deposition of Elizabeth Homewood – Exhibit 04 – Spreadsheets – Customer List											
DX-561	PX-1033	RQC0109373	RQC0109373	10/5/2011	2011.12.21 Deposition of Elizabeth Homewood – Exhibit 04 – Spreadsheets – Customer List (update of October 5, 2011 version)											
DX-562				12/19/2011	Summary Chart of Lawson US Customers with Configuration 3 and 5 on Active Maintenance, as of May 23, 2011											
DX-563	PX-1035	RQC0561907	RQC0561909	3/15/2013	2011.12.21 Deposition of Elizabeth Homewood – Exhibit 06 – "Timeline for ePlus Patent Litigation (ERH)"											
DX-564					WITHDRAWN	Email from N. Anderson to R. Umali et al. re: PLEASE READ – Important Content										
DX-565		RQC2076749	RQC2076750	5/29/2011	Email from E. Homewood to N. Anderson RE: ePlus – Status Update											
DX-566		RQC0915427	RQC0915428	6/1/2011	Email from E. Homewood to ORG-All Support & Delivery re: IMPORTANT – PLEASE READ: Knowledge Base unavailable externally											
DX-567		RQC004126	RQC004126	6/2/2011	"Lawson S3 Requisition Center is generally available today – May 18th, 2011."											
DX-568	PX-1156	RQC000722	RQC000722	5/18/2011												Stipulated Exhibit

## Specific Objections

Def. No.	Pkt. No.	Begin Dates	End Dates	Date	Exhibit/Description	106	401402	403	30/80/2/8	901	1006	FRCP 26	MIL	NR	INACC	NOT EVIDENCE	
DX-569	RQC0915431	RQC0915432			External Communications	X	X	X	X	X	X						
DX-570	RQC0113765	RQC0113775			WITHDRAWN Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X	X						
DX-571					WITHDRAWN												
DX-572					WITHDRAWN												
DX-573	RQC0113826	RQC0113829			Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X	X						
DX-574					WITHDRAWN												
DX-575	RQC0113869	RQC0113870			Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X	X						
DX-576	RQC0113907	RQC0113908			Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X	X						
DX-577	RQC0113988	RQC0114036			Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X	X						
DX-578					WITHDRAWN												
DX-579					WITHDRAWN												
DX-580					WITHDRAWN												
DX-581	RQC0114771	RQC0114772			Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X	X						
DX-582	RQC0115382	RQC0115382			Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X	X						
DX-583	RQC0116773	RQC0116774			Excerpt from "Cases with RSS Dialogue"	X	X	X	X	X	X						
DX-584					SWAT Cases" spreadsheet												
DX-585	PX-1060	RQC0109375			Stipulated Exhibit												
DX-586	PX-1195	RQC011357			Lawson Consulting Services – RQC SWAT Team Financial Update												
DX-587	RQC0355362	RQC0355362	5/27/2011		Email from S. Hanson to TEAM-Scott Hanson, TEAM-Mark Deutsch, and TEAM-Joey Alcazar re: Installation/patching of RSS	X	X	X	X	X	X						
DX-588	RQC017353	RQC0017354	5/27/2011		Email from B. Offenbacher to S. Hanson and M. Roisum RE: Greenville RSS Install	X	X	X	X	X	X						
DX-589	RQC2296568	RQC2296570	5/28/2011		Email from C. Bennett to S. Merten re: Team call notes and CRITICAL UPDATE – PLEASE REVIEW ASAP												
DX-590	PX-1152	RQC000348	RQC000348	5/1/2011	Lawson Requisition Center Installation Guide, Version 9.0.1 (IBM)												
DX-591	PX-1059	RQC000364	RQC000379	6/1/2011	2011-12-29 Deposition of Scott Hanson – Exhibit 08 – Lawson Requisition Center Installation Guide, Version 9.0.1 (Unix/Windows)												
DX-592					WITHDRAWN												
DX-593	PX-1061	RQC0109374	RQC0109374		2011-12-29 Deposition of Scott Hanson – Exhibit 11 – "RQC SWAT Activities" spreadsheet												
DX-594	PX-1012	RQC000384	RQC000384	5/1/2011	2011-12-19 Deposition of Dale Christopherson – Exhibit 20 – Lawson Requisition Center User Guide, Version 9.0.1												
DX-595					WITHDRAWN												
DX-596					Stipulated Exhibit												
DX-597	RQC0636377	RQC02656380	6/22/2011		Email from T. Olson-Stepp to D. Hager FW: RQC SWAT status - June 20/2011	X	X	X	X	X	X						
DX-598					WITHDRAWN												
DX-599					WITHDRAWN												
DX-600					WITHDRAWN												
DX-601					WITHDRAWN												
DX-602					WITHDRAWN												
DX-603					WITHDRAWN												
DX-604					WITHDRAWN												
DX-605	PX-1019	RQC2291408	RQC2291410	4/25/2011	2012-01-06 Deposition of Keith Lohkamp – Exhibit 10 – Presentation: Introducing Lawson Requisition Center												
DX-606	PX-1113	RQC0833191	RQC0883229	6/3/2011	Deposition of Keith Lohkamp – Exhibit 11 – Email from J. Langer to N. Anderson FW: LRC webinar follow-up: questions and recordings w/ attachment LRC Question and Answers.txt												
DX-607	PX-1105	RQC089052	RQC0869093	6/3/2011	Requisition Center Launch Project Charter											No Objections	
DX-608		RQC0117217	RQC0117227	4/8/2011													

## Specific Objections

Def. No.	Pkt. No.	Begin Dates	End Dates	Date	Exhibit Description	106	401402	403	80/802/8	05	901	1006	FRCP 26	MIL	NR	INACC	NOT EVIDENCE
DX-609	FX-1115	RQC050893	RQC050903	5/2/2011	2012.01.06 Deposition of Keith Lohkamp – Exhibit 13 – Email and attachment, Lawson Requisition Center, How To Sell 2012.01.06 Deposition of Keith Lohkamp – Exhibit 14 – Email from D. Christopherson to D. Kempker, J. Langer et al. RE: Recommendation on next steps for RSS and RQC												Stipulated Exhibit
DX-610	FX-1116	RQC230171	RQC2300173	5/18/2011													Stipulated Exhibit
DX-611																	
DX-612																	
DX-613																	
DX-614																	
DX-615																	
DX-616																	
DX-617																	
DX-618																	
DX-619																	
DX-620																	
DX-621		RQC223356	RQC225357	6/6/2011	Email from K. Lohkamp to G. Benton RE: Call notes – Version Dependencies for ROC												
DX-622		RQC2120905_1	RQC2120905_33	6/7/2011	"Lawson Requisition Center Field Enablement" presentation												Stipulated Exhibit
DX-623	FX-1068	RQC0870774	RQC0870777	6/2/2011	Email from K. Lohkamp to D. Davidson RE: RSS to Req Center Upgrade												Stipulated Exhibit
DX-624	FX-1010	RQC000656	RQC0006890	6/3/2011	Introducing Lawson Requisition Center												Stipulated Exhibit
DX-625	FX-1011	RQC0006895	RQC0007008	5/1/2011	Lawson Requisition Center Overview												Stipulated Exhibit
DX-626	FX-1000	RQC0000001	RQC0000046		Lawson Procurement Punchout and PO Dispatcher Installation and Administration Guide for Lawson Applications 8.1.x and 9.x Version 3.0.1.4												
DX-627																	
DX-628																	No Objections
DX-629																	No Objections
DX-630																	No Objections
DX-631																	No Objections
DX-632																	
DX-633																	
DX-634																	
DX-635																	
DX-636																	
DX-637																	
DX-638																	
DX-639																	
DX-640																	
DX-641																	
DX-642																	
DX-643	FX-1077																Stipulated Exhibit
DX-644	FX-1078																Stipulated Exhibit
DX-645																	
DX-646																	
DX-647																	
DX-648																	
DX-649																	
DX-650																	
DX-651																	
DX-652																	

## Specific Objections

Def. No.	Plt. No.	Begin Bates	End Bates	Date	Exhibit Description	106	401/402	403	801/802/8	905	901	1006	FRCP 26	MIL	NR	INACC.	NOT EVIDENCE
DX-653					WITHDRAWN												
DX-654					WITHDRAWN												
DX-655					2012/02/06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 7: ePlus income statement (FY Q3:2011 – Q2:2012)	x			x	x	x						x
DX-656					Exhibit 8: Lawson income statement: Americas region (FY 2011)	x			x	x	x						x
DX-657					2012/02/06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 8: Schedule A: Lawson income statement: Americas region (FY 2011) profit margins for license, maintenance, and service revenues	x			x	x	x						x
DX-658					2012/02/06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 8: Schedule B: Regression results to determine Lawson's incremental margin	x			x	x	x						x
DX-659					2012/02/06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 8: Schedule C: Lawson incremental profit	x			x	x	x						x
DX-660					WITHDRAWN												
DX-661					WITHDRAWN												
DX-662					WITHDRAWN												
DX-663					WITHDRAWN												
DX-664					WITHDRAWN												
DX-665					WITHDRAWN												
DX-666					2012/02/06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 12: Summary of RSSiRC customers	x			x	x	x						x
DX-667					2012/02/06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 12, Schedule A: List of customers in prohibited configurations	x			x	x	x						x
DX-668					WITHDRAWN												
DX-669					WITHDRAWN												
DX-670					WITHDRAWN												
DX-671					WITHDRAWN												
DX-672					2012/02/06 Expert Report of Jonathan D. Putnam, Ph.D. – Figure 5: Lawson quarterly sales and marketing expenses vs. revenues vs (2000-2011)	x			x	x	x						x
DX-673					2012/02/06 Expert Report of Jonathan D. Putnam, Ph.D. – Figure 6: Quarterly % changes in Lawson revenues vs. sales & marketing expenses 2000 -2011	x			x	x	x						x
DX-674					WITHDRAWN												
DX-675					WITHDRAWN												
DX-676					Lawson Software Customer Agreement with Heartland Regional Medical Center	x	x		x								
DX-677		L0305319	8/21/2007		Income Statement – ePlus Systems	x	x		x								
DX-678	L0305236	4/26/2010			ePlus 10-K Forms (2009-2011)	x	x		x								x
DX-679	ePLUS949075				The Forrester Wave: eProcurement Solutions, Q1 2011												
DX-680					ePlus, Inc. Statement of Profit and Loss Fiscal Years ending March 31												
DX-681	DX-690				Lawson Annual 10-K Forms (2009)												
DX-682					Lawson Annual 10-K Forms (2010)												
DX-683	DX-693				WITHDRAWN												
DX-684	DX-440				Lawson Financial Data 2000-2011 downloaded from Thomson Financial	x			x		x						x
DX-685					WITHDRAWN												
DX-686					WITHDRAWN												
DX-687					Draft email from Keith Lohkamp to Will Schultz RE: URGENT	x			x								
DX-688	RQC1002864	9/1/2011			ePlus – Declarations from customers				x								
DX-689	RQC1003055	6/27/2011			Email from Dale Christoperson to Will Schultz RE: # of total hours to transition to RQC	x											

## Specific Objections

Def. No.	Plt. No.	Begin Dates	End Dates	Date	Exhibit Description	106	401402	403	80180278	05	91	1006	FRCP 26	MIL	NR	INACC	NOT EVIDENCE
DX-690	RQC1000122	RQC1000123		6/3/2011	Email from Dale Christopherson to Todd Dooner Fwd: Updated on Requested Change to Requisition Center related to Punchout.												No Objections
DX-691	RQC1000157			6/1/2011	Email from Dale Christopherson to John Mulchtrone FW: Change to Punchout												No Objections
DX-692	RQC0859381			6/3/2011	Meeting request from Bruce McPheeers Re: Urgent call at 4 pm Central today to decide about additional punchout change "Introducing Lawson Requisition Center Webinar (June 3, 2011) Questions And Answers"	x		x	x	x							No Objections
DX-693	PX-1002	RQC0000655		6/3/2011	Email from Dale Christopherson FW: For Legal Review - Q&A from Friday Webinar + Attachment												No Objections
DX-694	PX-1155	RQC2270574		6/10/2011	"Lawson Requisition Center: What's New and Different"												No Objections
DX-695	PX-1156	RQC0000721		6/9/2011	Email from Dale Christopherson to Keith Lohkamp and Todd Dooner Re: Here is the concept!												No Objections
DX-696	PX-1049	RQC2154689		4/21/2011	Letter from Dan McDonald to Scott Robertson Re: ePlus Inc. v. Lawson Software, Inc.	x		x	x	x	x					x	
DX-697	RQC2139806	RQC2139821		6/10/2011	Calendar invite from Bruce McPheeers Re: Important ePlus patent suit Planning meeting - Please Attend												No Objections
DX-698	RQC1000847	RQC1000848		2/1/2011	Email from Dan McDonald Re: Urgent: Your help needed with battle plan against ePlus	x		x	x	x	x						No Objections
DX-699	RQC1001536			2/17/2011	Email from John Mulchtrone Re: ePlus- Quick Update	x											
DX-700	RQC0919780	00001		3/11/2011													No Objections
DX-701	RQC1000376			3/31/2011	Email from Dale Christopherson to Guenther Tolkmitt RE: do you want to be updated on the RSS replacement project												No Objections
DX-702	RQC0915215	00001	RQC0915215_000002	4/12/2011	Email from Dale Christopherson to John Mulchtrone FW: ePlus - proposed behavior for RSS and Punchout	x		x	x	x	x	x					No Objections
DX-703					WITHDRAWN												
DX-704	RQC0868692	00001	RQC0868692_000002	2/9/2011	Meeting invite Re: Canceled: Urgent: Your help needed with battle plan against ePlus	x		x	x	x	x	x					No Objections
DX-705	RQC0868732	00001	RQC0868732_000004	2/9/2011	Attachment to DC-710_S-3 RSS/Punchout and M3 Battle Plan Against ePlus					x	x	x					Duplicate of DX-737
DX-706	RQC0915301			RQC0915301_000010	3/14/2011	Email from Dale Christopherson attaching '2011 03 11 Mitigation Strategies(2).JDX'			x	x	x	x					No Objections
DX-707	PX-1041	RQC0117312		RQC0117313	6/7/2011	Calendar invite from Jennifer Langer Re: ROC Team: Legal requested changes to Punch-out...											No Objections
DX-708	RQC3005746	RQC3005747		6/7/2011	Email from Bruce McPheeers to Keith Lohkamp RE: Need Guidance on Patch												No Objections
DX-709	RQC0800636	RQC0800637		6/28/2011	Jira ticket Case 132676 Summary												No Objections
DX-710	PX-1178	RQC010354		4/26/2011	Email from Dale Christopherson FW: How did testing go?												No Objections
DX-711	PX-1244	RQC2741740		10/31/2012	USA PL PY2012 P&L Statement												No Objections
DX-712	PX-1245	RQC2741741		12/1/11 - 8/31/12	Lawson Revenue SKU Report All Data - 8-31-12												No Objections
DX-713	PX-1249	RQC2741745		11/30/2012	Lawson Revenue SKU Report All Data - 11-30-12												No Objections
DX-714					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph. D. – Exhibit 1: Curriculum Vitae of Jonathan D. Putnam, Ph.D.	x									x		
DX-715					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 2: List of Documents Considered	x									x		
DX-716					2012.02.06 Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 2: List of Documents Considered	x									x		
DX-717					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 3: Comparison of Damages Calculation.	x									x		
DX-718					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 4: Apportionment of Lawson accused revenues	x									x		
DX-719					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph.D. – Exhibit 5: Summary of Lawson Accused Revenues	x									x		

Specific Objections

Def. No.	Pkt. No.	Begin Bates	End Bates	Date	Exhibit Description	106	401/402	403	801/802/8	901	1006	FRCP 26	MIL	NR	INACC.	NOT EVIDENCE
DX-720					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph. D. – Exhibit 6: Summary of Lawson Accused License and Maintenance Revenues		x									x
DX-721					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph. D. – Exhibit 7: Calculation of Accused Service Revenues		x									x
DX-722					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph. D. – Exhibit 7H: Calculation of Accused License/Maintenance for Healthcare Customers		x									x
DX-723					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph. D. – Exhibit 8: Calculation of Accused Revenues for Healthcare Customers		x									x
DX-724					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph. D. – Exhibit 8: Calculation of Apportionment Factors		x								x	x
DX-725					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph. D. – Exhibit 9: Lawson Income Statement		x									x
DX-726					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph. D. – Exhibit 10: Lawson Income Statement Americas Region, Profit Margins		x								x	x
DX-727					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph. D. – Exhibit 11: Regression Results to Determine Lawson's Incremental Margin		x									x
DX-728					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph. D. – Exhibit 12: Calculation of Lawson's Incremental Profit		x									x
DX-729					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph. D. – Exhibit 13: Summary of Lawson Customers with Prohibited Configurations		x									x
DX-730					2013.03.08 Supplemental Expert Report of Jonathan D. Putnam, Ph. D. – Exhibit 14: Customers Without All Infringing SKUs		x									x
DX-731	L0165533	L016553	L0165579	5/26/1993	Lawson Software Customer Agreement with Cash America International, Inc.		x	x	x	x	x					
DX-732	L0217632	L0217630	L0217630	5/30/2002	Lawson Software Customer Agreement with Legacy Health System		x	x	x	x	x					
DX-733	LE00208653	LE00208692	LE00208692	3/22/2005	Prestbyterian Healthcare Services ERP System Request for Proposal		x	x	x	x	x					x
DX-734	FX-0367	ePLUS09423569	ePLUS0942599	4/22/2010	eplus screenshots of RSS punchout demo	x	x	x	x	x	x					x
DX-735	FX-0379	ePLUS09438949	ePLUS0943898	5/3/2010	eplus screenshots of RSS item Master/punchout demo	x	x	x	x	x	x					x
DX-736	FX-1250	RQC3000243	RQC3000244	6/3/2011	Email string from D. Christensen to J. Mulchrone and B. Crawford FW: Changes RSS to ROC											
DX-737	FX-1235	RQC1003184	RQC1003185	6/7/2011	Email string from J. Langer to B. McPheeters, K. Lohkamp and M. Cohen re: Need Guidance on Patch											
DX-738		RQC1003001	RQC1003001	5/23/2011	(Und. Direct Ex. 1) Email from D. Hager to J. Catalino, B. Murphy and D. Siebert re RSS deals this quarter			x	x	x	x					x
DX-739		ePLUS0229503	ePLUS0229572	5/26/2004	eplus v. Ariba Complaint dated May 26, 2004		x	x	x	x	x					x
DX-740		ePLUS0232381	ePLUS0233069	4/18/2005	eplus v. SAP Complaint dated April 18, 2005		x	x	x	x	x					x
DX-741		ePLUS0430972	ePLUS0431032	6/17/2002	Master Software License Agreement between ePlus and Gannett		x	x	x	x	x					
DX-742				5/18/2010	Plaintiff's Second Supplemental Answers to Lawson's Second Set of Interrogatories dated 05/18/10											
DX-743				5/18/2010	Plaintiff's Second Supplemental Answers to Lawson's Fourth Set of Interrogatories dated 05/18/10		x	x	x	x	x					
DX-744				2/7/2011	ePlus's Rule 26 Supplemental Disclosure Concerning Injunctive Relief		x	x	x	x	x					x
DX-745				2/10/2011	Office Action mailed February 10, 2011 in U.S. Application No. 90111,066 (983 Patent, claims 1-25)		x	x	x	x	x				x	
DX-746					ePlus Rebuttal Disclosure Concerning Injunctive Relief		x	x	x	x	x				x	
DX-747					WITHDRAWN											

Specific Objections

Def. No.	Plt. No.	Begin Bates	End Bates	Date	Exhibit Description	106	401/402	403	80/80/8	901	1006	FRCP 26	MIL	NR	INACC	NOT EVIDENCE
DX-748	PX-0043	ePLUS0524597	ePLUS0524622	2/12/2005	Settlement & License Agreement between Ariba, Inc. and ePLUS, Inc., dated February 12, 2005	x	x	x				x				
DX-749	PX-0317	ePLUS0940765	ePLUS0940776	8/28/2009	Settlement and License Agreement between ePLUS Inc. and Perfect Commerce, LLC and Exhibits A and B	x	x	x				x				
DX-750	PX-0318	ePLUS0940777	ePLUS0940801	12/11/2006	Patent License and Settlement Agreement among SAP America, Inc., SAP AG and ePLUS Inc.	x	x					x				
DX-751	PX-0319	ePLUS0940802	ePLUS0940814	8/19/2009	Settlement and License Agreement between ePLUS, Inc. and SciQuest, Inc. and Exhibits A and B	x	x					x				
DX-752	PX-0320	ePLUS0940815	ePLUS0940835	7/7/2009	Settlement and License Agreement between ePLUS Inc. and Verian Technologies, Inc. and Exhibits A and B	x	x					x				
DX-753				3/25/2011	Transcript of Evidentiary Hearing regarding Motion for Permanent Injunction	x	x	x				x				
DX-754				5/18/2011	Decision of the Board of Patent Appeals and Interferences	x	x	x				x				
DX-755				3/23/2012	Decision of the Board of Patent Appeals and Interferences	x	x	x				x				
DX-756				6/20/1905	2013/02/20 Deposition of K. Ugone – Exhibit 3—“Ugone et al., Preparing the Financial Expert or Economist article	x										
DX-757					2013/02/20 Deposition of K. Ugone – Exhibit 4—“Accounting for Damages in Intellectual Property Litigation”	x										
DX-758				9/4/2009	2013/02/20 Deposition of K. Ugone – Exhibit 5—Order, Two Inc. v. Dish Network Corp et al., C.A. 2:04-cv-01 (DF)	x										x

Respectfully Submitted,

March 18, 2013

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 18th day of March, 2013, I will electronically file the foregoing

**ePLUS, INC.'S OBJECTIONS TO DEFENDANT LAWSON SOFTWARE, INC.'S  
PROPOSED EXHIBIT LIST FOR CONTEMPT PROCEEDINGS**

with the Clerk of Court using the CM/ECF system which will then send a notification of such filing (NEF) via email to the following:

<p>Christopher Dean Dusseault, <i>pro hac vice</i>            Jason Lo, <i>pro hac vice</i>            Timothy P. Best, <i>pro hac vice</i>            GIBSON, DUNN &amp; CRUTCHER LLP            333 S. Grand Avenue            Los Angeles, CA 90071            Telephone: (213) 229-7000            Facsimile: (213) 229-6659            CDusseault@gibsondunn.com            JLo@gibsondunn.com            TBest@gibsondunn.com            VAED-620ExternalServiceList@gibsondunn.com</p>	<p>Robert A. Angle, VSB#37691            Dabney J. Carr, IV, VSB #28679            Megan C. Rahman (VSB No. 42678)            Timothy J. St. George (VSB No. 77349)            TROUTMAN SANDERS LLP            P.O. Box 1122            Richmond, Virginia 23218-1122            Telephone: (804) 697-1238            Facsimile: (804) 698-5119            robert.angle@troutmansanders.com            dabney.carr@troutmansanders.com            megan.rahman@troutmansanders.com            tim.stgeorge@troutmansanders.com</p>
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